

# **Exhibit 1**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
EASTERN DIVISION

FEDERAL INSURANCE COMPANY,  
*et al.*,

Plaintiffs,

v.

SHAW INDUSTRIES, INC.,

Defendant

and

COMMERCE & INDUSTRY  
INSURANCE COMPANY, *et al.*;

Nominal Defendants.

CIVIL ACTION NO. 1:23-cv-01367-RDP

**DECLARATION OF BILL WHITMIRE**

I, Bill Whitmire, declare as follows:

1. I am currently the Vice President of Risk Management of Shaw Industries, Inc., a subsidiary of Shaw Industries, Group, Inc.,
2. I am submitting this Declaration in connection with Shaw's Motion to Transfer Venue in this action.
3. I have personal knowledge of the facts set forth herein, and if called as a witness to testify thereto, I could competently and truthfully do so.
4. Both Shaw Industries, Inc. and Shaw Industries, Group, Inc. are corporations incorporated under the laws of Georgia and have their principal place of business in Dalton, Georgia.
5. Shaw Industries, Inc. does not own or operate any manufacturing assets. Shaw Industries, Inc.'s parent company, Shaw Industries Group, Inc.,

manufactures carpet, resilient flooring, hardwood, tile and stone, synthetic turf and other specialty flooring products.

6. Shaw's manufacturing facilities are primarily located in or around Dalton, Georgia.

7. Shaw Industries, Inc. and Shaw Industries Group, Inc. have been named as defendants in multiple lawsuits alleging environmental contamination caused by Shaw's operations, including:

a. *Water Works and Sewer Bd. of City of Gadsden v. 3M, et al.*, (Circuit Court of Etowah County, Alabama, Case No. 31-cv-2016-9000676.00);

b. *Water Works and Sewer Bd. of Town of Centre v. 3M et al.*, (Circuit Court of Cherokee County, Alabama, Case No. 13-CV-2017-900049.00);

c. *City of Rome v. 3M, et al.*, (Superior Court of Floyd County, Georgia, Case No. 19cv02405JFL003);

d. *Jarrod Johnson, et al. v. 3M, et al.* (United States District Court, Northern District of Georgia, Case No. 19CV02448JFL003); and

e. *Shelby County, Alabama and Talladega County, Alabama v. 3M Company, et al.*, (Circuit Court of Talladega County, Alabama, Case No. 61-cv-2023-900112.00).

8. The allegations of Shaw's use of PFAS and disposal of wastewater and other waste that have been asserted in the lawsuits identified in paragraph 7 occurred in or around Dalton, Georgia.

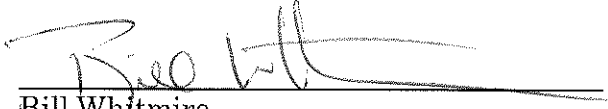
9. Dalton Utilities, the municipal utility that has handled the disposal of wastewater from Shaw Industries Group, Inc.'s manufacturing facilities for more than 50 years is likewise located in Dalton, Georgia.

10. Each of the policies of insurance issued to Shaw by the Plaintiffs and Nominal Defendants in this action were delivered, received, and accepted in

Georgia.

11. Shaw's physical business records are located in Dalton, Georgia.

I declare under penalty of perjury under the laws of the State of Georgia that the foregoing is true and correct and that this declaration was executed on this 30 day of November, 2023, at Dalton, Georgia.

  
Bill Whitmire